



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2024 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESUS ESTEBAN RIOS-IBARRA,
aka "Jesus Rios Chuy Jr.,"
RACHEL PEREZ RODRIGUEZ,
aka "Midget,"
aka "Rachel Valdez,"
aka "Anna Perez,"
aka "Diane Rodriguez,"
JORGE FRANCO, and
CARLOS JAVIER GALLEGOS,
aka "Worm,"
aka "Trigger,"

Defendants.

CR No. 2:24-cr-00623-SVW

I N D I C T M E N T

[21 U.S.C. § 846: Conspiracy to
Distribute and to Possess With
Intent to Distribute Fentanyl;
21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(vi): Possession with
Intent to Distribute Fentanyl;
21 U.S.C. § 853: Criminal
Forfeiture]

The Grand Jury charges:

COUNT ONE

[21 U.S.C. § 846]

[ALL DEFENDANTS]

A. OBJECTS OF THE CONSPIRACY

Beginning on a date unknown to the Grand Jury, and continuing
until on or about June 26, 2024, in Los Angeles County, within the

1 Central District of California, and elsewhere, defendants JESUS
2 ESTEBAN RIOS-IBARRA, also known as ("aka") "Jesus Rios Chuy Jr.,"
3 RACHEL PEREZ RODRIGUEZ, aka "Midget," aka "Rachel Valdez," aka "Anna
4 Perez," aka "Diane Rodriguez," JORGE FRANCO, and CARLOS JAVIER
5 GALLEGOS, aka "Worm," aka "Trigger," and others known and unknown to
6 the Grand Jury, conspired with each other to knowingly and
7 intentionally distribute, and possess with intent to distribute, at
8 least 400 grams of a mixture and substance containing a detectable
9 amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide
10 ("fentanyl"), a Schedule II narcotic drug controlled substance, in
11 violation of Title 21, United States Code, Sections 841(a)(1),
12 (b)(1)(A)(vi).

13 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
14 ACCOMPLISHED

15 The objects of the conspiracy were to be accomplished, in
16 substance, as follows:

17 1. Defendant RIOS-IBARRA would negotiate with drug customers
18 to sell pills containing fentanyl in exchange for cash and would
19 arrange to have the pills delivered at a meeting location.

20 2. Defendant RIOS-IBARRA would meet with drug customers to
21 conduct drug sales at the pre-arranged meeting location.

22 3. Defendants FRANCO and RODRIGUEZ would travel to the
23 vicinity of the meeting location in a separate vehicle with the pills
24 containing fentanyl.

25 4. At the direction of defendants RIOS-IBARRA and RODRIGUEZ,
26 defendant FRANCO would drive his vehicle to the meeting location,
27 where defendant RODRIGUEZ would show the pills containing fentanyl to
28 the drug customer.

1 5. Defendant GALLEGOS would serve as a lookout during drug
2 transactions and, in the event drug transactions were not completed,
3 would transport the pills containing fentanyl away from the location
4 where the drug transaction was to have taken place.

5 C. OVERT ACTS

6 On or about the following dates, in furtherance of the
7 conspiracy and to accomplish its objects, defendants RIOS-IBARRA,
8 RODRIGUEZ, FRANCO, and GALLEGOS, and others known and unknown to the
9 Grand Jury, committed various overt acts in Los Angeles County,
10 within the Central District of California, and elsewhere, including,
11 but not limited to, the following:

12 1. On June 25, 2024, defendant RIOS-IBARRA arranged to sell
13 approximately 100,000 pills containing fentanyl to an individual
14 posing as a drug customer but who was, in fact, a confidential source
15 working for law enforcement (the "CS").

16 2. On June 26, 2024, defendant RIOS-IBARRA directed the CS to
17 meet defendant RIOS-IBARRA at a location in Pomona, California (the
18 "Meeting Location") to conduct the drug transaction.

19 3. On June 26, 2024, defendant RIOS-IBARRA traveled to the
20 Meeting Location.

21 4. On June 26, 2024, defendants FRANCO and RODRIGUEZ traveled
22 to the vicinity of the Meeting Location in a white Volkswagen van
23 (the "White Volkswagen") with a duffel bag containing approximately
24 13.17 kilograms of pills containing fentanyl.

25 5. On June 26, 2024, after the CS arrived at the Meeting
26 Location, defendants RIOS-IBARRA and RODRIGUEZ directed defendant
27 FRANCO to drive the White Volkswagen to the Meeting Location.

1 6. On June 26, 2024, after defendant FRANCO drove the White
2 Volkswagen to the Meeting Location, and at defendant RIOS-IBARRA's
3 direction, defendant RODRIGUEZ opened the White Volkswagen's side
4 door, opened the duffel bag that was in the White Volkswagen, and
5 showed the CS the pills containing fentanyl that were inside the
6 duffel bag.

7 7. On June 26, 2024, after the CS left the Meeting Location,
8 defendant RODRIGUEZ removed the duffel bag containing the pills
9 containing fentanyl from the White Volkswagen and placed them into
10 the back of another car, then drove that car into the backyard of a
11 house in the vicinity of the Meeting Location.

12 8. On June 26, 2024, defendant GALLEGOS drove a silver-colored
13 Toyota sedan (the "Silver Toyota") into the backyard of the same
14 house in the vicinity of the Meeting Location into which defendant
15 RODRIGUEZ had just driven in another car.

16 9. On June 26, 2024, defendant RODRIGUEZ placed the duffel bag
17 containing the pills containing fentanyl into the Silver Toyota and
18 got into the Silver Toyota.

19 10. On June 26, 2024, defendant GALLEGOS drove the Silver
20 Toyota containing him, defendant RODRIGUEZ, and the pills containing
21 fentanyl away from the Meeting Location.

22 D. SERIOUS VIOLENT FELONY

23 Prior to committing the offense alleged in this Count, defendant
24 FRANCO had been finally convicted of a serious violent felony, as
25 that term is defined and used in Title 21, United States Code,
26 Sections 802(58), 841, and 851, namely, on or about March 9, 2001, in
27 the Superior Court for the State of California, County of Los
28 Angeles, case number KA050211, defendant FRANCO was convicted of two

1 counts of Attempted Murder, in violation of California Penal Code
2 Sections 664/187(a), for which defendant FRANCO served a term of
3 imprisonment of more than 12 months.

COUNT TWO

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(vi); 18 U.S.C. § 2(a)]

[DEFENDANTS RIOS-IBARRA, RODRIGUEZ, AND FRANCO]

On or about June 26, 2024, inside of a Volkswagen van in Los Angeles County, within the Central District of California, defendants JESUS ESTEBAN RIOS-IBARRA, also known as ("aka") "Jesus Rios Chuy Jr.," RACHEL PEREZ RODRIGUEZ, aka "Midget," aka "Rachel Valdez," aka "Anna Perez," aka "Diane Rodriguez," and JORGE FRANCO, each aiding and abetting the other, knowingly and intentionally possessed with intent to distribute at least 400 grams, that is, approximately 13.17 kilograms, of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II narcotic drug controlled substance.

Prior to committing the offense alleged in this Count, defendant FRANCO had been finally convicted of a serious violent felony, as that term is defined and used in Title 21, United States Code, Sections 802(58), 841, and 851, namely, on or about March 9, 2001, in the Superior Court for the State of California, County of Los Angeles, case number KA050211, defendant FRANCO was convicted of two counts of Attempted Murder, in violation of California Penal Code Sections 664/187(a), for which defendant FRANCO served a term of imprisonment of more than 12 months.

COUNT THREE

[21 U.S.C. §§ 841(a)(1), (b)(1)(A)(vi)]

[DEFENDANT GALLEGOS]

On or about June 26, 2024, inside of a Toyota sedan in Los Angeles County, within the Central District of California, defendant CARLOS JAVIER GALLEGOS, aka "Worm," aka "Trigger," knowingly and intentionally possessed with intent to distribute at least 400 grams, that is, approximately 13.17 kilograms, of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"), a Schedule II narcotic drug controlled substance.

FORFEITURE ALLEGATION

[21 U.S.C. § 853]

1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 21, United States Code, Section 853 in the event of any defendant's conviction of the offense set forth in any of Counts One through Three of this Indictment.

2. Any defendant, if so convicted, shall forfeit to the United States of America the following:

(a) All right, title and interest in any and all property, real or personal, constituting or derived from, any proceeds which the defendant obtained, directly or indirectly, from such offense;

(b) All right, title and interest in any and all property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense; and

(c) To the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraphs (a) and (b).

3. Pursuant to Title 21, United States Code, Section 853(p), any defendant, if so convicted, shall forfeit substitute property if, by any act or omission of defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to, or deposited with a third party; (c) has been placed beyond the

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jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property that cannot be divided without difficulty.

A TRUE BILL

/s/
Foreperson

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